

Appendix A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
DIVISION

United States Courts
Southern District of Texas
FILED

January 22, 2021

Nathan Ochsner, Clerk of Court

Pamela Elizabeth Branch

versus

Harris County
Harris County Flood Control

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§
§

CIVIL ACTION NO. _____

4:21cv2224

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

Address:

County of Residence:

3. The defendant is:

Address:

Pamela Elizabeth Branch

23958 Dorrington Estates
Conroe, Texas 77385

Montgomery

Harris County (Harris City Flood Control)

1019 Congress, Fifteenth Floor

Houston, Texas 77002

Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on 3-10-2016 with the Equal Opportunity Commission.

5. On the date of 11/2/2020, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) race
- (b) color
- (c) sex
- (d) religion
- (e) national origin,

the defendant has:

- (a) failed to employ the plaintiff
- (b) terminated the plaintiff's employment
- (c) failed to promote the plaintiff
- (d) other: During My tenure; I was unable to manage the team & perform my Duties as a manager.

7. When and how the defendant has discriminated against the plaintiff:

Several occasions - I have evidence and witnesses to the discrimination, I was written up & placed on Performance improvement without cause, falsely accused harassed by employees

8. The plaintiff requests that the defendant be ordered:

- (a) to stop discriminating against the plaintiff
- (b) to employ the plaintiff
- (c) to re-employ the plaintiff
- (d) to promote the plaintiff

(e) to _____

and that;

(f) the Court grant other relief, including injunctions, damages, costs and attorney's fees.



Ronald J. Branch
(Signature of Plaintiff)

Address: 23958 Derringay Estates
Corsicana, Texas 77385
Telephone: 832-403-7359

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Pamela Branch**
23958 Dorrington Estates
Conroe, TX 77385

From: **Houston District Office**
Mickey Leland Building
1919 Smith Street, 7th Floor
Houston, TX 77002



*On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(e))*

EEOC Charge No.

EEOC Representative

Telephone No.

460-2020-03415

Hannah Ye,
Investigator Support Asst

(346) 327-7723**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.
- The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- Other (briefly state)

- NOTICE OF SUIT RIGHTS -*(See the additional information attached to this form.)*

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred **more than 2 years (3 years)** before you file suit may not be collectible.

On behalf of the Commission

Gabriel Cervantes
Digitally signed by Gabriel Cervantes
 DN:cn=Gabriel.Cervantes,o=EEOC,ou_email=gabriel.cervantes@eecd.gov,c=US
 Date: 2020.11.02 12:04:55 -06'00'
11/2/2020

Enclosures(s)

for

Rayford O. Irvin,
District Director

(Date Mailed)

cc:

Vine Ryan
County Attorney
HARRIS COUNTY FLOOD CONTROL DISTRICT
9900 NW Freeway
Houston, TX 77092

Texas Workforce Commission-Civil Rights Division
101 East 15th Street Room 144T
Austin, TX 78778